

ATTACHMENT J-1
DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PAGE:LINE
DESIGNATIONS

Andrew Alexander:

Page:Line	Objection	Response
19:25 – 20:19	Irrelevant (401)	
21:2 – 14	Irrelevant (401)	
32:9-12	Irrelevant; confusion of issues (403)	
91:9-23	Irrelevant (401); confusion of issues (403)	
92:25 – 93:3; 93:6-12	Irrelevant (401); confusion of issues (403)	
95:8-14	Irrelevant (401); confusion of issues (403)	
236:25 – 237:22	Irrelevant (401); confusion of issues (403)	

Michele Wherle:

Page:Line	Objection	Response
95:23-25	Irrelevant (401); unfairly prejudicial (403)	
96:4-22	Irrelevant (401); confusion of issues (403)	
98:8-18	Irrelevant (401); unfairly prejudicial	
100:23 – 101:1	Misleading and unfairly prejudicial (403) (the witness already testified to prostitution training much earlier than the question pre-supposes)	

Vince Vittatoe:

Page:Line	Objection	Response
22:3-7	Irrelevant (401)	
22:21-24	Irrelevant (401)	
24:8-10, 25	Irrelevant (401)	
66:6-12	Irrelevant (401)	

70:21-24	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
115:22 – 117:12	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
120:20 – 122:5	Irrelevant (401); confusion of issues (403)	
131:20 – 133:23	Irrelevant (401); unfairly prejudicial and confusion of issues (403); improper character evidence (404); hearsay without any exceptions	
145:16 – 146:7	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	

Michael Thomas:

Red Roof objects to the use of Michael Thomas' deposition as he was not a percipient fact witness to any events that occurred regarding Plaintiff or the property at issue in this case. His testimony about what occurred at another property is irrelevant to the elements of Plaintiff's TVPRA claim. Moreover, it is unfairly prejudicial and confuses the issues for the jury as to what allegedly occurred at another property. Thomas' testimony creates a trial within a trial on what occurred at the Buckhead property. Finally, testimony about occurrences at an unrelated property, involving unrelated ventures and unrelated trafficking victims is barred by Evid.R. 404(a)(1) as it is an attempt to prove bad character by Red Roof Inn and taint the jury. Therefore, his entire testimony is irrelevant. Red Roof specifically objects to each designated portion of the testimony below. Further, Red Roof has provided counter designations to Mr. Thomas' testimony to the extent the Court overrules its objection only.

Page:Line	Objection	Response
14:24 – 15:5	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	
15:22-24	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	
16:4-13	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	

17:14 – 19:9	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	
27:2 – 39:20	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404); speculation	
40:6 – 46:4	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404); speculation; hearsay	
46:18 – 48:11	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	
48:12 – 49:2	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404); speculation	

Greg Stocker Individual:

Page:Line	Objection	Response
17:7-10	Confusion of issues (403) (there are not 5 Red Roof entities that are defendants in this case)	
27:10-25	Irrelevant (401) and confusion of issues (403) (as to prostitution)	
28:11 – 29:1	Irrelevant (401); confusion of issues (403); needlessly cumulative	
31:25 – 32:13	Irrelevant (401); confusion of issues (403); lacks factual foundation	
33:3 – 33:15	Irrelevant (401); confusion of issues (403); lacks factual foundation	
34:6-19	Irrelevant (401); confusion of issues (403); lacks factual foundation	

36:17 – 37:14	Irrelevant (401); confusion of issues (403); lacks factual foundation	
37:19-22	Irrelevant (401); confusion of issues (403); lacks factual foundation	
38:8-11	Irrelevant (401); confusion of issues (403); lacks factual foundation	
38:15-19	Irrelevant (401); confusion of issues (403); lacks factual foundation	
38:22-23	Irrelevant (401); confusion of issues (403); lacks factual foundation	
39:1-3	Irrelevant (401); confusion of issues (403); lacks factual foundation	
39:6-11	Irrelevant (401); confusion of issues (403); lacks factual foundation	
39:14-15	Irrelevant (401); confusion of issues (403); lacks factual foundation	
40:1 – 41:1	Irrelevant (401); confusion of issues (403)	
42:18-24	Irrelevant (401); confusion of issues (403)	
43:9 – 44:11	Irrelevant (401); confusion of issues/ unfairly prejudicial (403)	
55:9-15	Irrelevant (401); confusion of issues (403)	
55:20 – 56:2	Irrelevant (401); confusion of issues (403)	
56:6-8	Irrelevant (401); confusion of issues (403)	
57:4-14		
57:20-23		
59:17 – 60:7	Irrelevant (401); confusion of issues (403)	
61:24 – 62:7	Irrelevant (401); confusion of issues (403)	
70:15-20	Irrelevant (401); confusion of issues (403); privileged	

78:4 – 80:21	Irrelevant (401); confusion of issues (403)	
81:4-19	Irrelevant (401); confusion of issues (403)	
82:9-14	Irrelevant (401); confusion of issues (403)	
94:23 – 95:14	Irrelevant (401); confusion of issues (403)	
96:7 – 99:5	Irrelevant (401); confusion of issues (403)	
99:17-21	Irrelevant (401); confusion of issues (403)	
100:14 – 101:6	Irrelevant (401); confusion of issues (403)	
102:3-13	Irrelevant (401); confusion of issues (403); privileged	
140:13-18	Irrelevant (401); confusion of issues (403)	

Jay Moyer, March 18, 2022 (W.K.)

Page:Line	Objection	Response
25:1-7	Irrelevant (401); unfairly prejudicial (403)	
29:18-21	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
32:10 – 33:9	Irrelevant (401); confusion of issues (403)	
35:1-10	Irrelevant (401); confusion of issues (403)	
45:15 – 46:18	Irrelevant (401); confusion of issues (403)	
46:24 – 47:16	Irrelevant (401); confusion of issues (403)	
48:10 – 50:17	Irrelevant (401); confusion of issues (403)	
52:19 – 53:10	Irrelevant (401); confusion of issues (403)	
54:21 – 56:15	Irrelevant (401); confusion of issues (403); improper hypothetical	
58:10 – 59:19	Irrelevant (401); confusion of issues (403)	
120:1 – 128:24	Irrelevant (401); confusion of issues/unfairly prejudicial	

	(403); improper character evidence (404)	
129:23 – 133:12	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper character evidence (404)	
133:24 – 134:21	Irrelevant (401); confusion of issues (403); needlessly cumulative	
135:1 – 138:12	Irrelevant (401); confusion of issues/unfairly prejudicial (403); needlessly cumulative; improper character evidence (404)	
141:1-14	Irrelevant (401); confusion of issues/unfairly prejudicial (403); needlessly cumulative; improper character evidence (404)	
142:1 – 144:5	Irrelevant (401); confusion of issues (403)	
144:10 – 145:12	Irrelevant (401); confusion of issues (403)	
145:24 – 146:4	Irrelevant (401); confusion of issues (403); improper character evidence (404)	
147:2 – 152:12	Irrelevant (401); confusion of issues (403); improper character evidence (404)	
152:21 – 153:10	Irrelevant (401); confusion of issues (403); improper character evidence (404)	
155:19 – 157:11	Irrelevant (401); confusion of issues (403)	
158:3 – 162:1	Irrelevant (401); confusion of issues (403)	
173:18 – 174:8	Irrelevant (401); confusion of issues (403)	
174:12 – 175:19	Irrelevant (401); confusion of issues (403)	
181:9 - 20	Irrelevant (401); confusion of issues (403); improper hypothetical	
181:25 – 182:2	Irrelevant (401); unfairly prejudicial (403); improper	

	character evidence (404); hearsay	
183:7 – 187:7	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404); hearsay	
187:15-17	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404); hearsay	
187:21 – 193:7	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404); hearsay	
201:3-5	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
202:6-8	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
202:18-23	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
204:13 – 209:5	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
209:14-22	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
211:11 – 220:19	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
228:4-5	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
228:14 – 237:2	Irrelevant (401); unfairly prejudicial (403); improper character evidence (404)	
251:2-6	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	
251:12 – 252:25	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	

253:14 – 262:9	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	
284:13-14	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	
285:3 – 288:14	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	
335:21 – 337:20	Irrelevant (401); unfairly prejudicial/confusion of issues; (403); improper character evidence (404)	

Deposition of Jay Moyer, March 24, 2023 (H.B.)

Page:Line	Objection	Response
16:24 – 18:10	Irrelevant (401); confusion of issues (403)	
18:21 – 20:13	Irrelevant (401); confusion of issues (403); improper hypothetical	
20:19 – 22:23	Irrelevant (401); confusion of issues (403)	
26:7-15	Foundation	
32:8-19	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	
33:17-24	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	
34:2 – 35:12	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	
36:13 – 37:4	Hearsay	
37:11 – 38:6	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	
39:10 – 40:12	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	

Deposition of Glen Galbraith, March 24, 2023:

Page:Line	Objection	Response
38:16-17; 39:2 – 40:25; 41:5-20	Irrelevant (401); confusion of issues (403); needlessly cumulative	
43:4-18	Irrelevant (401); needlessly cumulative	
60:5 – 17	Irrelevant (401); argumentative; confusion of issues (403)	
62:21 – 25	Irrelevant (401); seeks a legal conclusion; foundation; improper legal standard; confusion of issues (403)	
63:2-8	Irrelevant (401); confusion of issues (403)	
63:23 – 65:19	Irrelevant (401); confusion of issues (403); seeks legal conclusion; improper legal standard	
70:5 – 72:10	Irrelevant (401); confusion of issues (403)	
75:17-21; 76:13 – 77:11	Irrelevant (401); confusion of issues (403); hearsay	
77:18 – 78:12	Irrelevant (401); confusion of issues (403); foundation	
78:18 – 79:8	Irrelevant (401); confusion of issues (403); foundation	
79:9 – 80:6	Irrelevant (401); confusion of issues (403); hearsay; foundation	
80:21 – 81:6; 81:13 – 83:17	Irrelevant (401); confusion of issues (403)	
83:20 – 85:20	Irrelevant (401); confusion of issues (403)	
86:3-6; 86:11-15	Irrelevant (401); confusion of issues (403)	
87:6 – 89:18	Irrelevant (401); confusion of issues (403)	
90:22 – 92:15	Irrelevant (401); confusion of issues (403)	
93:5 – 96:4	Irrelevant (401); confusion of issues (403)	
96:20 – 97:1	Hearsay	
97:8 – 98:7	Hearsay; speculation	

98:9 – 105:18	Hearsay; speculation; irrelevant (401); unfairly prejudicial (403); foundation	
105:21 – 108:2	Speculation; calls for lay opinion; improper attorney testimony	
108:4 – 110:1	Speculation; improper lay opinion; improper attorney testimony	
110:4 – 111:12	Hearsay; foundation	
111:16-17	Hearsay	
112:9 – 118:1	Hearsay; unfairly prejudicial (403)	
119:22 – 122:20	Hearsay; unfairly prejudicial (403); Irrelevant (401)	
122:21 – 126:12	Irrelevant (401); confusion of issues (403)	
135:25 – 136:24	Irrelevant (401); confusion of issues (403); foundation	
141:12 – 16	Irrelevant (401); confusion of issues (403)	
143:5 – 144:21	Irrelevant (401); confusion of issues (403)	
145:16 – 148:10	Irrelevant (401); confusion of issues (403)	
149:24 – 151:15	Irrelevant (401); confusion of issues (403); assumes facts not in evidence; improper hypothetical;	
151:16 – 154:4	Irrelevant (401); confusion of issues (403); foundation	
155:19 – 156:23	Irrelevant (401); confusion of issues (403)	
156:24 – 158:14	Irrelevant (401); confusion of issues (403); needlessly cumulative	
160:12-20	Irrelevant (401); confusion of issues (403)	
162:2 – 163:4	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper hypothetical; seeks irrelevant legal conclusions	
163:11 – 165:2	Irrelevant (401); confusion of issues/unfairly prejudicial (403); improper hypothetical;	

	seeks irrelevant legal conclusions	
170:7-10	Not testimony	
175:10 – 176:2	Seeks legal conclusion; improper lay opinion; portions not testimony	

John Park Deposition

Page:Line	Objection	Response
14:13-18; 15:2-7	Confusion of issues (there are not 5 defendants in this case) (403)	
58:22 – 59:22	Irrelevant (401); confusion of issues (403); needlessly cumulative	
63:1-12	Irrelevant (401); confusion of issues (403)	
63:22 – 64:3	Irrelevant (401); confusion of issues (403)	
68:22 – 69:1	Irrelevant (401); confusion of issues (403)	
69:14-19	Irrelevant (401); confusion of issues (403)	
72:4-13	Irrelevant (401); confusion of issues (403)	
122:17-25	Irrelevant (401); confusion of issues/unfairly prejudicial (403)	